

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ASIAN AMERICANS ADVANCING
JUSTICE–ATLANTA, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, *et al.*,

Defendants.

Case No. 1:21-CV-01333-JPB

**CONSENT MOTION TO
SUBSTITUTE KELVIN
WILLIAMS, ACTING
ELECTIONS SUPERVISOR OF
THE GWINNETT COUNTY
BOARD OF REGISTRATIONS
AND ELECTIONS, IN HIS
OFFICIAL CAPACITY, FOR
LYNN LEDFORD, DIRECTOR
OF THE GWINNETT COUNTY
BOARD OF REGISTRATIONS
AND ELECTIONS, IN HER
OFFICIAL CAPACITY.**

Plaintiffs ASIAN AMERICANS ADVANCING JUSTICE–ATLANTA, STEVEN J. PAIK, DEEPUM PATEL, NORA AQUINO, THUY HANG TRAN, THAO TRAN, and ANJALI ENJETI-SYDOW (collectively, “Plaintiffs”) respectfully move this Court to substitute Kelvin Williams, Acting Elections Supervisor of the Gwinnett County Board of Registrations and Elections, in his official capacity, as a defendant in place of Lynn Ledford, named as Director of the Gwinnett County Board of Registrations and Elections, in her official capacity. The

undersigned has conferred with counsel for Defendants GWINNETT COUNTY BOARD OF REGISTRATIONS AND ELECTIONS, ALICE O'LENICK, WANDY TAYLOR, STEPHEN W. DAY, JOHN MANGANO, GEORGE AWUKU, SANTIAGO MARQUEZ and LYNN LEDFORD (collectively, "Gwinnett County Defendants") and is authorized to state that the Gwinnett County Defendants consent to this motion to substitute. Plaintiffs and the Gwinnett County Defendants stipulate to this substitution to better reflect the nomenclature of the official charged with administering and supervising elections in Gwinnett County under local law.

A proposed order granting the Motion is attached.

Respectfully submitted, this 1st day of June, 2021.

/s/ Phi Nguyen

PHI NGUYEN (Georgia Bar No.
578019)

HILLARY LI (Georgia Bar No.
898375)

**ASIAN AMERICANS
ADVANCING JUSTICE–
ATLANTA**

5680 Oakbrook Parkway, Suite 148
Norcross, Georgia 30093

404 585 8446 (Telephone)

404 890 5690 (Facsimile)

pnguyen@advancingjustice-atlanta.org

hli@advancingjustice-atlanta.org

EILEEN MA*

**ASIAN AMERICANS
ADVANCING JUSTICE–ASIAN
LAW CAUCUS**

55 Columbus Avenue

San Francisco, CA 94111

415 896 1701 (Telephone)

415 896 1702 (Facsimile)

eileenm@advancingjustice-alc.org

NIYATI SHAH*

TERRY AO MINNIS*^o

ASIAN AMERICANS

ADVANCING JUSTICE–AAJC

1620 L Street, NW, Suite 1050

Washington, DC 20036

202 815 1098 (Telephone)

202 296 2318 (Facsimile)

nshah@advancingjustice-aaajc.org

tminnis@advancingjustice-aaajc.org

LEO L. LAM*

R. ADAM LAURIDSEN*

CONNIE P. SUNG*

CANDICE MAI KHANH NGUYEN*

**KEKER, VAN NEST AND PETERS
LLP**

633 Battery Street

San Francisco, CA 94111-1809

415 391 5400 (Telephone)

415 397 7188 (Facsimile)

llam@keker.com

alauridsen@keker.com

csung@keker.com

cnguyen@keker.com

Attorneys for Plaintiff

**Admitted pro hac vice*

^o Not admitted in D.C.

/s/ TUWANDA RUSH WILLIAMS

Deputy County Attorney

Georgia Bar No. 619545

Gwinnett County Law Department

75 Langley Drive

Lawrenceville, GA 30046

770-822-8700

tuwanda.williams@gwinnettcounty.com

/s/MELANIE F. WILSON

Senior Assistant County Attorney

Georgia Bar No. 768870
Gwinnett County Law Department
75 Langley Drive
Lawrenceville, GA 30046
770-822-8700
melanie.wilson@gwinnettcountry.com

Attorneys for Gwinnett County Defendants

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of L.R. 5.1, using font type of Times New Roman and a point size of 14.

Dated: June 1, 2021

/s/ Phi Nguyen
PHI NGUYEN

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021, I electronically filed this document with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Dated: June 1, 2021

/s/ Phi Nguyen
PHI NGUYEN

Counsel for Plaintiffs